

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

RANGEL RAMIREZ-MANZANO,

Defendant.

NO. CR22-0161-RSL

**PROTECTIVE ORDER**

This matter, having come to the Court's attention on the government's motion for entry of a discovery protective order, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

**1. Protected and Sensitive Material.**

*A. Protected Material.* The following documents and materials are deemed Protected Material:

- i. Grand Jury transcripts and exhibits;
- ii. Witness statements, including but not limited to reports of law enforcement officers memorializing witness statements; and
- iii. The personal information related to victims and/or witnesses, and any statements and/or documents containing personal information related to any victims and/or witnesses. As used in this Order, the term "personal information" refers to

1 each victim and/or witnesses' date of birth, Social Security number (or other  
 2 identification information), driver's license number, address, telephone number, location  
 3 of residence or employment, school records, juvenile criminal records, financial records,  
 4 and other confidential information. In addition, with respect to any victims in this case,  
 5 the term "personal information" also includes the name and identity of each victim.

6 The United States will make available copies of the Protected Materials, including  
 7 those filed under seal, to defense counsel to comply with the government's discovery  
 8 obligations. Possession of copies of the Protected Materials is limited to defense counsel,  
 9 investigators, paralegals, law clerks, experts and assistants for defense counsel  
 10 (hereinafter collectively referred to as "members of the defense team"):

11 The members of the defense team may share and review the Protected Material  
 12 with the Defendant. The attorneys of record and members of the defense team  
 13 acknowledge that providing copies of the Protected Material to the Defendant and other  
 14 persons is prohibited, and agree not to duplicate or provide copies of the Protected  
 15 Material to the Defendant and other persons. The exception to this prohibition is the  
 16 dissemination of electronic copies to the Federal Detention Center at SeaTac,  
 17 Washington, for use in a controlled environment by Defendant, who is currently in  
 18 custody there.

19 *B. Sensitive Material.* The following documents and materials are  
 20 deemed Sensitive Material:

- 21 i. Medical records related to victims and/or witnesses;
- 22 ii. Sexually suggestive photographs of victims and/or witnesses;
- 23 and
- 24 iii. Records containing personal information, including financial
- 25 or credit card information, dates of birth, and Social Security Information, that are too
- 26 voluminous to redact.

27 Possession of Sensitive Material is limited to defense counsel and members of the  
 28 defense team. Defense counsel and members of the defense team may not share or

1 review the documents containing Sensitive Material, or any copies of any documents  
2 containing Sensitive Material, in any manner with any other person, including Defendant.  
3 This order, however, does not prohibit defense counsel and members of the defense team  
4 from discussing the contents of documents constituting Sensitive Material with  
5 Defendant, as long as defense counsel and members of the defense team do not share the  
6 documents or copies of the documents with Defendant or any other person. Defense  
7 counsel and members of the defense team shall keep any documents containing Sensitive  
8 Material secured whenever the documents containing Sensitive Material is not being used  
9 in furtherance of their work in the above captioned case.

10 Additional discovery items may be deemed by the parties to constitute Protective  
11 or Sensitive Material upon agreement.

12 Any violation of these prohibitions constitutes a violation of the Protective Order.  
13 Further, defense counsel are required, prior to disseminating any copies of the Protected  
14 or Sensitive Materials to members of the defense team, to provide a copy of this  
15 Protective Order to members of the defense team, and obtain written consent by members  
16 of the defense team of their acknowledgment to be bound by the terms and conditions of  
17 this Protective Order. The written consent need not be disclosed or produced to the  
18 United States unless requested by the Assistant United States Attorney and ordered by the  
19 Court.

20 Nothing in this order should be construed as imposing any discovery obligations  
21 on the government that are different from those imposed by case law and Rule 16 of the  
22 Federal Rules of Criminal Procedure.

## 23 **2. Filing**

24 Any Protected or Sensitive Material that is filed with the Court in connection with  
25 pre-trial motions, trial, or other matter before this Court, shall be filed under seal and  
26 shall remain sealed until otherwise ordered by this Court. This does not entitle either  
27 party to seal their filings as a matter of course. The parties are required to comply in all  
28

1 respects to the relevant local and federal rules of criminal procedure pertaining to the  
2 sealing of court documents.

3 **3. Nontermination**

4 The provisions of this Order shall not terminate at the conclusion of this  
5 prosecution.

6 **4. Violation of Any Terms of this Order**

7 Any violation of any term or condition of this Order by the Defendant, his  
8 attorneys of record, or any member of the defense team, may be held in contempt of  
9 court, and/or may be subject to monetary or other sanctions as deemed appropriate by this  
10 Court.

11 If the Defendant violates any term or condition of this Order, the United States  
12 reserves its right to seek a sentencing enhancement for obstruction of justice, or to file  
13 any criminal charges relating to the defendant's violation.

14 **5. Right to Review**

15 The parties agree that in the event that compliance with this Order makes it  
16 difficult for defense counsel to adhere to their Sixth Amendment obligations, or  
17 otherwise imposes an unworkable burden on counsel, defense counsel shall bring any  
18 concerns about the terms of the Order to the attention of the government. The parties  
19 shall then meet and confer with the intention of finding a mutually acceptable solution.  
20 In the event that the parties cannot reach such a solution, defense counsel shall have the  
21 right to bring any concerns about the scope or terms of the Order to the attention of the  
22 Court.

23 //

24 //

1 The Clerk of the Court is directed to provide a filed copy of this Protective Order  
2 to all counsel of record.

3 DATED this 18th day of October, 2022.

4  
5 

6  
7 THE HONORABLE ROBERT S. LASNIK  
8 UNITED STATES DISTRICT JUDGE  
9

10 Presented by:

11 s/ Catherine L. Crisham

12 CATHERINE L. CRISHAM

13 Assistant United States Attorney  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28